

RICHARD A. JONES (Bar No. 135248)
Email: rjones@cov.com
COVINGTON & BURLING LLP
1 Front Street
San Francisco, CA 94111
Telephone: (415) 591-6000
Facsimile: (415) 591-6091

THOMAS S. WILLIAMSON, JR. (*Pro hac vice*)
Email: twilliamson@cov.com
BENJAMIN J. RAZI (*Pro hac vice*)
Email: brazj@cov.com
SHIMICA D. GASKINS (*Pro hac vice*)
Email: sgaskins@cov.com
COVINGTON & BURLING LLP
1201 Pennsylvania Ave., N.W.
Washington, DC 20004
Telephone: (202) 662-6000
Facsimile: (202) 662-6291

Attorneys for Defendant
GILEAD SCIENCES, INC.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DAVID MOORE,

Plaintiff,

v.

GILEAD SCIENCES, INC.,

Defendant.

Case No. CV 07-3850 SI

**AMENDED JOINT STIPULATION
ON PROPOSED PRETRIAL
DISCOVERY DATES**

Judge: Honorable Susan Y. Illston

TO THE HONORABLE COURT:

Plaintiff David Moore (hereinafter, “Moore” or “Plaintiff”) and Defendant
Gilead Sciences, Inc. (hereinafter, “Gilead” or “Defendant”) by and through their respective
counsel of record, hereby stipulate and agrees as follows:

1
2 WHEREAS, on December 22, 2011, the parties submitted a Joint Stipulation on
3 Proposed Pretrial Discovery Dates (the "Stipulation"), which the Court so ordered on December
4 27, 2011;

5 WHEREAS, the Stipulation provided for fact discovery to be concluded by
6 January 27, 2012, and for expert discovery, further briefing on Gilead's motion for sanctions,
7 and dispositive motions to follow thereafter;

8 WHEREAS, as a result of scheduling issues with third-party witnesses, fact
9 discovery will continue two weeks longer than envisioned in the Stipulation -- until February
10 10, 2012;

11 Accordingly, Gilead believes it is appropriate to adjust the briefing schedule on
12 the pending motion for sanctions and for dispositive motions, as set forth below, and the
13 Plaintiff has agreed to and joins in Gilead's request. The only proposed dates that have been
14 changed from the parties' prior Stipulation are the date for Gilead's reply brief in support of its
15 motion for sanctions (which, if the Court agrees, would be filed on February 17, 2012, as
16 opposed to on February 10, 2012) and the dispositive motion briefing and hearing dates (all of
17 which, if the Court agrees, would be extended by 14 days to account for the 14-day enlargement
18 of the period for fact discovery). The parties' amended proposed pretrial schedule is as follows:

19
20 **Motion for Sanctions**

21 **Gilead's Reply Due:** February 17, 2012;

22 **Hearing:** March 2, 2012

23
24 **Dispositive Motions, Pretrial Conference, and Trial**

25 **Dispositive Motions:** February 27, 2012;

26 **Oppositions Due:** March 21, 2012;

27 **Reply Due:** March 28, 2012;

28 **Hearing:** April 13, 2012

Trial Documents Due: April 3, 2012;

Pretrial Conference: April 17, 2012;

Trial: April 30, 2012;

NOW, IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES,
and their undersigned counsel; and the parties, therefore, respectfully request that the Court
enter the proposed pretrial schedule.

Dated: February 6, 2012

By: /s/ Shimica D. Gaskins

SHIMICA D. GASKINS (*PRO HAC VICE*)
THOMAS S. WILLIAMSON, JR. (*PRO HAC*
VICE)
BENJAMIN J. RAZI (*PRO HAC VICE*)
Email: brazi@cov.com
COVINGTON & BURLING LLP
1201 PENNSYLVANIA AVE., N.W.
WASHINGTON, DC 20004
(202) 662-6000
TWILLIAMSON@COV.COM
SGASKINS@COV.COM

Attorneys for Defendant Gilead Sciences,
Inc.

By: /s/ Rob Hennig

ROB HENNIG (STATE BAR NO. 174646)
LAW OFFICES OF ROB HENNIG
1875 CENTURY PARK EAST, SUITE 1770.
LOS ANGELES, CA 90067
(310) 843-0020
FAX: (310) 843-9150
ROB@ROBHENNIG.COM

WAYNE SMITH
LAW OFFICES OF VICTOR L. GEORGE
20355 Hawthorne Blvd., 1st Floor
Torrance, CA 90503
(310) 698-0990
Fax: (310) 698-0995

wsmith@vgeorgelaw.com

Attorneys for Plaintiff David Moore



GENERAL ORDER 45, SECTION X.B. ATTESTATION

I hereby attest that we have obtained concurrence in this filing for any signatures indicated by a “conformed” signature (/s/) within this efiled document.

By: /s/ Shimica D. Gaskins

SHIMICA D. GASKINS (*PRO HAC VICE*)

COVINGTON & BURLING LLP

1201 PENNSYLVANIA AVE., N.W.

WASHINGTON, DC 20004

(202) 662-6000

SGASKINS@COV.COM

Attorney for Defendant Gilead Sciences,
Inc.